

Annual 47 C.F.R. § 64.2009(e) CPNI Certification For 2013

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 26, 2014

Name of company covered by this certification: **DBR360, Inc.**

Form 499 Filer ID: **825931**

Name of signatory: **Michael Avis**

Title of signatory: **Senior Vice President, Finance & Administration**

I, Michael Avis, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

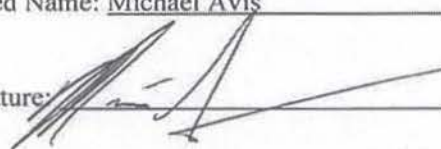
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. The company has adopted measures to protect CPNI, including CPNI protection practices, procedures and training designed to ensure compliance with the FCC's CPNI Rules.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Nor is the company aware of any instances involving unauthorized disclosure of CPNI or improper access of CPNI by company employees or access by individuals not authorized to receive or view the information.

Printed Name: Michael Avis

Position: Senior VP, Finance & Administration

Signature: 

Date: 2/26/14

**ANNUAL 47 C.F.R. § 64.2009(e) CERTIFICATION
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
COMPLIANCE STATEMENT**

EB DOCKET No. 06-36

DBR360, Inc.

Statement of CPNI Procedures and Compliance (2013)

DBR360, Inc. ("DBR360" or "Company") is a private telecommunications network provider that implements networks designed to address individual customer specifications. DBR360 provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to contracts and via sales through a dedicated account representative. DBR360's customer contracts uniformly contain confidentiality arrangements that address customer private information. It is DBR360's policy not to disclose CPNI except as specifically set out in its contracts with customers and where required by law. The Company primarily builds and manages private telecommunications networks for large organizations, firms with complex network needs, carriers, system integrators and clouds service providers. The Company's marketing efforts never include the use of CPNI nor does the Company provide any usage-sensitive services to customers.

DBR360 does retain CPNI information that relates to the quantity, technical configuration, type, destination, location and amount of use of telecommunications service(s) subscribed to by its customers. However, the Company does not obtain, retain or use call detail records for marketing purposes.

DBR360 is committed to protecting the confidentiality of all customer information, including CPNI. The Company maintains all files containing CPNI in a secure manner such that they cannot be used, accessed, disclosed or destroyed by unauthorized employees or in an unauthorized manner. All customer information, including CPNI, is available through a password protected systems with specific levels of access based on the individual employee's job need. Employees with a need for customer specific information, including CPNI, is available through a password protected system with specific levels of access based on the individual employee's job need. Employee with a need for customer specific information, including CPNI, is granted access to the password protected system by individual department managers only. The Company prohibits such violations through employment agreements (which including prohibitions against unauthorized use, access, disclosure of customer information) and through other means which provide for disciplinary action for violations up to and including termination of employment. The provision of CPNI to any unrelated third party is strictly prohibits except for billing purpose and for the provision, maintenance and repair of services.

The Company does not provide online access to CPNI or other data at this time. The Company does not provide services which involve call detail.

The Company does not have any retail locations and therefore does not maintain or disclose call detail records in-store.

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CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
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The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United State Secret Service, FBI and customers, as required by applicable law.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2013.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.